

**IN THE UNITED STATES BANKRUPTCY COURT  
OF THE EASTERN DISTRICT OF PENNSYLVANIA**

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In Re:	:	
Genevieve M. Skaggs	:	Chapter 13
	:	Case No.: 20-14778-AMC
Debtor(s)	:	
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**MOTION TO APPROVE LOAN MODIFICATION**

Debtor, Genevieve M. Skaggs, by and through Attorney Brad J. Sadek, moves this Honorable Court for an Order approving a loan modification with NewRez, LLC on the property located at 15 Fawn Lane Upper Chichester, PA 19061 and hereby avers the following:

1. Debtor filed a Voluntary Petition for relief under Chapter 13 of the Bankruptcy Code on December 18, 2020.
2. NewRez, LLC., the Mortgagee, has agreed to a mortgage loan modification on the debtor's property located at 15 Fawn Lane Upper Chichester, PA 19061 as the debtor successfully completed trial plan payments. See Final Modification Agreement attached as "Exhibit A."
3. The incurring of this loan modification is beneficial to all parties in this case in that it will allow NewRez, LLC to receive the necessary payments to complete the loan while allowing the debtors to retain their property without facing further financial strain by reducing the pre-petition arrears owed to the Mortgagee.
4. The debtor has continued to comply with the terms of the Chapter 13 Plan.
5. An Amended Chapter 13 Plan will follow the filing of this Motion to adjust for changes provided by the Final Modification.

**WHEREFORE**, Debtor, by and through the undersigned Counsel respectfully requests this Honorable Court to enter an Order Granting the Loan Modification regarding the mortgage on the property located at 15 Fawn Lane Upper Chichester, PA 19061.

Dated: September 17, 2021

/s/Brad J. Sadek, Esq  
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